

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

|                                 |   |                            |
|---------------------------------|---|----------------------------|
| IN RE: ASHLEY MADISON CUSTOMER  | ) |                            |
| DATA SECURITY BREACH LITIGATION | ) |                            |
|                                 | ) |                            |
| This Document Relates to:       | ) | MDL No. 2669               |
|                                 | ) |                            |
| ALL CASES                       | ) | Case No. 4:15-MD-02669-JAR |
|                                 | ) |                            |
|                                 | ) |                            |

**PLAINTIFFS AND CLASS SETTLEMENT COUNSEL’S MOTION FOR  
(1) APPROVAL OF ATTORNEYS’ FEES, (2) REIMBURSEMENT OF LITIGATION  
EXPENSES, AND (3) SERVICE AWARDS TO THE CLASS REPRESENTATIVES**

1. Class Settlement Counsel have negotiated a settlement which creates an \$11.2 million non-reversionary settlement fund and provides additional and substantial non-monetary relief. This settlement confers a substantial benefit on the Class in this difficult and novel class action.

2. Class Settlement Counsel therefore request a reasonable attorney fee award in the amount of one third (1/3) of the total settlement fund (\$3,733,333.33), plus expenses in the amount of \$78,032.38.

3. Plaintiffs and Class Settlement Counsel further request a service award of \$5,000 for each Class Representative named in the Consolidated Amended Complaint, which is intended to compensate Plaintiffs for their efforts in the litigation and their commitment on behalf of the Class.

4. The legal and factual reasons supporting Plaintiffs and Class Settlement Counsel’s Motion are set forth in their Memorandum in Support, filed herewith, and Plaintiffs and Class Settlement Counsel incorporate the same as if set forth fully herein.

WHEREFORE Plaintiffs and Class Settlement Counsel respectfully request that the Court enter its Order (1) Awarding Class Settlement Counsel attorneys' fees in the amount of one third (1/3) of the total settlement fund (\$3,733,333.33) to be distributed to Plaintiffs' counsel; (2) Awarding counsel \$78,032.38 in costs and expenses; and (3) awarding an incentive award of \$5,000 to each of the named Plaintiffs in the Amended Consolidated Class Action Complaint.

Date: October 20, 2017

Respectfully Submitted,

THE DRISCOLL FIRM, P.C.

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